

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**Re: Docket No. 1741**

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**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR’S  
FOURTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)  
(Substantive Duplicate Claims, Reclassified Claims)**

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The undersigned counsel to the Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On September 17, 2025, the *Plan Administrator’s Fourteenth Omnibus Objection to Certain Claims (Substantive) (Substantive Duplicate Claims, Reclassified Claims)* [Docket No. 1741] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was October 8, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. Prior to the Response Deadline, the Plan Administrator received informal responses to the Objection and Proposed Order from: (i) counsel to the GUC Trust, (ii) counsel to Liberty Mutual Insurance Company (“Liberty Mutual”), and (iii) the Creditors Adjustment Bureau, as assignee of Claim No. 15492 filed by Ningbo Zhong Ornaments Co Ltd (the “CAB Claim”).

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. To resolve the GUC Trust and Liberty Mutual's informal responses, the Plan Administrator, counsel to the GUC Trust, and counsel to Liberty Mutual, agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the "Revised Proposed Order").<sup>2</sup>

5. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

6. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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<sup>2</sup> The unresolved CAB Claim has been adjourned to a hearing date to be determined.

Dated: October 21, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

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**COLE SCHOTZ P.C.**

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